# A BRIEF GUIDE TO REQUIREMENTS FOR DEVELOPING AND IMPLEMENTING POLLUTION PREVENTION PLANS FOR INDUSTRIAL ACTIVITIES

Storm water runoff is part of the natural hydrologic cycle. However, human activities, particularly urbanization, can alter natural drainage patterns and add pollutants to the rainwater and snowmelt that run off the earth's surface and enter our Nation's rivers, lakes, streams, and coastal waters. In fact, recent studies have shown that storm water runoff is a major source of the pollutants that are damaging our sport and commercial fisheries, restricting swimming, and affecting the navigability of many of our Nation's waters.

The States and many municipalities have been taking the initiative to manage storm water discharges more effectively. Recognizing the importance of this problem, Congress also directed the U.S. Environmental Protection Agency (EPA) to develop a Federal program under the Clean Water Act to regulate certain high-priority storm water sources. The issuance of storm water discharge permits under the National Pollutant Discharge Elimination System (NPDES) is a major part of the Agency's efforts to restore and maintain the Nation's water quality.

Under the *NPDES General Permit for Storm Water Discharges* Associated with Industrial Activity, EPA requires the development and implementation of a pollution prevention plan — designed to reduce pollution at the source, before it can cause environmental problems that cost the public and private sectors in terms of lost resources and expensive environmental restoration activities.

#### **OVERVIEW OF POLLUTION PREVENTION PLAN REQUIREMENTS**

As shown on the chart on the following page, pollution prevention plan requirements have been organized to provide you with a step-by-step process for ensuring that pollutants are not making their way into the storm water discharges from your site. Toward this end, you will be selecting and implementing Best Management Practices (BMPs). BMPs include schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution in runoff from your site. The five major phases of the developing a pollution prevention plan are (1) planning and organization; (2) assessment; (3) BMP selection and plan design; (4) implementation; and (5) evaluation and site inspection. All permit holders must meet a number of general requirements. In addition, permittees who are subject to reporting requirements under Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA), (also known as Title 3 of the Superfund Amendment and Reauthorization Act [SARA]), will have to meet special requirements under EPA's general permit. These requirements are listed in boxes throughout this guide, and then elaborated upon in the final section.

This guide provides background information on pollution prevention planning requirements for permittees under the general permit. To walk you through the requirements, the guide is organized according to the phases of the pollution prevention planning process. A set of worksheets and a model plan at the end of the document are provided to further clarify requirements. A detailed manual on how to develop and implement your pollution prevention plan is available at a modest cost from the National Technical Information Service. The manual, titled Storm Water Management for Industrial Activities: Developing Pollution Prevention Plans and Best Management Practices, provides much more specific information than this brief guide. Instructions for ordering the detailed manual and a listing of other references that you may find useful can be found at the end of this guide.

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DEVELOPING AND IMPLEMENTING A STORM WATER POLLUTION PREVENTION PLAN FOR INDUSTRY

# PLANNING AND ORGANIZATION PHASE

Before you start putting your Storm Water Pollution Prevention Plan together, there are two steps that will facilitate the development of your plan. These steps are designed to help you organize your staff and make preliminary decisions: (A) decide who will be responsible for developing and implementing your Storm Water Pollution Prevention Plan, and (B) look at other existing environmental facility plans for consistency and overlap.

#### (A) Forming Your Pollution Prevention Team

As part of developing and implementing your pollution plan, you should (1) designate a specific individual or team who will develop, implement, maintain, and revise your pollution prevention plan, and (2) identify these individuals and describe each person's responsibilities at the site.

Since facilities differ in size and capacity, the number of team members will also vary. Designating one person may be appropriate as long as that individual is qualified to design and implement the plan. The plan should identify those people on site who are most familiar with the facility and its operations; these people, in turn, should provide structure and direction to the storm water management program. In all cases, someone in a senior management position must have overall responsibility for the plan.

The pollution prevention team is responsible for the following:

- Implementing all general permit and pollution prevention plan requirements
- Defining and agreeing upon an appropriate set of goals for the facility's storm water management program
- **Being aware** of any changes that are made in plant operations to determine whether any changes must be made to the Storm Water Pollution Prevention Plan
- Maintaining a clear line of communication with plant management to ensure a cooperative partnership.

**Worksheet #1** (located at the end of this guide) is an example of an appropriate form on which to list the team members. To complete this worksheet, list the pollution prevention team members by name, facility position (title), and phone number; include a brief description of each member's specific responsibilities. This list can be directly incorporated into the Storm Water Pollution Prevention Plan, but it should also be displayed or posted within the facility so that other plant employees are aware of who is responsible for storm water management.

#### (B) Building on Existing Environmental Management Plans

The pollution prevention team also must evaluate existing environmental management plans for consistency and determine which, if any, provisions can be incorporated into the Storm Water Pollution Prevention Plan.

Other related plans may include the Preparedness, Prevention and Contingency Plan (40 CFR Parts 264 and 265), the Spill Control and Countermeasures requirements (40 CFR Part 112), the National Pollutant Discharge Elimination System Toxic Organic Management Plan (40 CFR Parts 413, 433, and 469), and the Occupational Safety and Health Administration (OSHA) Emergency Action Plan (29 CFR Part 1910).

Although you should build on relevant portions of other environmental plans as appropriate, it is important to note that your Storm Water Pollution Prevention Plan must be a comprehensive, stand-alone document.

ADDITIONAL REQUIREMENTS FOR FACILITIES SUBJECT TO REPORTING UNDER EPCRA, SECTION 313, FOR WATER PRIORITY CHEMICALS—EPCRA contains additional reporting requirements for designated hazardous waste management facilities. EPA's Baseline General Permit contains the following specific requirements for such facilities:

- The team must designate a person who will be accountable for spill prevention at the facility and identify this person in the plan.
- The designated person is responsible for setting up necessary spill emergency procedures and reporting requirements to isolate, contain, and clean up spills and emergency releases of Section 313 water priority chemicals.

### **ASSESSMENT PHASE**

After identifying who is responsible for developing and implementing your plan and organizing your planning process, you should proceed to this next step—a pollutant source assessment. This is where you take a look at your facility and determine what materials or practices are (or may be) a source of contaminants to the storm water running off your site. To complete this phase, you will (A) create a map of the facility site to locate pollutant sources and determine storm water management opportunities, (B) conduct a material inventory, (C) evaluate past spills and leaks, (D) identify non-storm water discharges and illicit connections, (E) collect or evaluate storm water quality data, and (F) summarize the findings of this assessment. To select the most appropriate and effective control measures, consider that potential pollutant sources include areas where materials are handled or stored, outdoor processing areas, loading and unloading areas, and onsite waste management and disposal areas.

#### (A) Developing a Site Map

A site map is a complete illustration of site features. At a minimum, the site map must include information on the following:

- Discharge points ("outfalls")
- · Drainage patterns
- Identification of the types of pollutants likely to be discharged for each drainage area
- · Direction of flow
- Surface water bodies, including any proximate stream, river, lake, or other water body receiving storm water discharges from the site
- Structural control measures (physically constructed features used to control storm water flows)
- Locations of significant materials exposed to storm water
- Locations of industrial activities (such as fueling stations, loading and unloading areas, vehicle or equipment maintenance areas, waste disposal areas, storage areas).

**Worksheet #2** (located at the end of this guide) provides guidance on completing your site map.

#### (B) Materials Inventory

Each facility must inventory the types of materials that are handled, stored, or processed onsite. "Significant materials" are of particular concern and are defined as follows:

**Significant Materials:** Raw materials; fuels; materials such as solvents, detergents, and plastic pellets; finished materials such as metallic products; raw materials used in food processing or production; hazardous substances designated under section 101(14) of CERCLA; any chemical the facility is required to report pursuant to EPCRA, Section 313; fertilizers; pesticides; and waste products such as ashes, slag, and sludge that have the potential to be released with storm water discharges [40 CFR 122.26(b)(12)].

To complete the materials inventory, the facility must do two specific tasks:

- **List** materials that have been exposed to storm water in the past 3 years (focus on areas where materials are stored, processed, transported, or transferred).
- **Provide** a narrative description of methods and location of storage and disposal areas, materials management practices, treatment practices, and any structural/nonstructural control measures.
  - Structural practices are fixed equipment such as berms, detention ponds, or grassed swales.
  - Nonstructural practices may include regularly scheduled actions such as sweeping or inspections.

**Worksheet #3** (located at the end of this guide) will assist you in conducting a material inventory for your Storm Water Pollution Prevention Plan. If any of the significant materials on your site have been exposed to storm water in the 3 years prior to the effective date of your permit, complete **Worksheet #3A** and include it in your plan.

#### (C) Identifying Past Spills and Leaks

Provide a list of significant spills and leaks of toxic or hazardous that have occurred in the past 3 years. "Significant spills" includes releases in excess of reportable quantities defined as follows:

**Reportable Quantity (RQ) Discharge**: An RQ release occurs when a quantity of a hazardous substance or oil is spilled or released within a 24-hour period of time and exceeds the RQ level assigned to that substance under CERCLA or the Clean Water Act. These levels or quantities are defined in terms of gallons or pounds. Regulations listing these quantities are contained at 40 CFR 302.4, 40 CFR 117.21 and 40 CFR 110.10.

Permittees are encouraged to list spills and leaks of nonhazardous materials as well as spills of hazardous materials.

**Worksheet #4** (located at the end of this guide) can help you organize this list of leaks and spills. The areas on your site where significant leaks or spills have occurred are areas on which you should focus very closely when selecting BMPs.

#### (D) Non-Storm Water Discharges

To certify that your facility has been tested or evaluated for non-storm water discharges, you must:

- Identify potential non-storm water discharges
- Describe the method used and results of any test and/or evaluation for such discharges
- Indicate the location of the onsite drainage points that were checked during the test or evaluation
- **Provide** the date of the test or evaluation. (If you cannot test or evaluate potential non-storm water discharges, notice must still be made by certification.)

Examples of non-storm water discharges include any water used directly in the manufacturing process (process water), air conditioner condensate, noncontact cooling water, vehicle wash water, or sanitary wastes.

To check for non-storm water discharges, you can use one of the following three common dry weather tests: visual inspection; plant schematic review; and/or dye testing.

**Worksheet #5** (located at the end of this guide) will assist you in conducting a non-storm water discharge assessment and certification for outfalls at your site. If you are unable to test and/or provide certification for the presence of non-storm water discharges, please refer to **Worksheet #6**.

#### (E) Existing Monitoring Data

Where existing storm water sampling data are available, the facility must (1) **provide** a summary of any existing storm water sampling data and (2) **describe** the sample collection procedures used.

#### (F) Site Evaluation Summary

This step is critical, as it will become the foundation for the rest of the Storm Water Pollution Prevention Plan. Facilities must fulfill the following requirements:

- **Provide** a narrative description of activities with a high potential to contaminate storm water at your site, including those associated with materials loading and unloading, outdoor storage, outdoor manufacturing or processing, onsite waste disposal, and significant dust or particulate generating activities
- Describe any pollutants of concern that may be associated with such activities.

Once you have completed the above steps in your pollutant source assessment, you should have enough information to determine which areas, activities, or materials may contribute pollutants to storm water runoff from your site. With this information, you can select the most appropriate BMPs to prevent or control pollutants from these areas.

# BMP/SELECTION AND PLAN DESIGN PHASE

Once you have identified and assessed potential and existing sources of storm water contamination at your facility, the next step is to select the proper Best Management Practices (BMPs) that will address these pollutant sources. To satisfy the requirements of this phase, you must provide a narrative description of the BMPs you have selected for your site. At a minimum, your plan must incorporate the following eight "baseline" BMPs: (A) good housekeeping, (B) preventive maintenance, (C) visual inspections, (D) spill prevention and response, (E) sediment and erosion prevention, (F) traditional storm water management practices, (G) other BMPs as appropriate, (H) employee training, and (I) recordkeeping and reporting. A number of these BMPs are discussed below.

#### (A) Good Housekeeping

Good housekeeping practices are designed to maintain a clean and orderly work environment. Often the most effective first step towards preventing pollution in storm water from industrial sites involves merely using good common sense to improve the facility's basic housekeeping methods. The following are some simple procedures that a facility can consider incorporating into an effective good housekeeping program:

- Improve operation and maintenance of industrial machinery and processes.
- Implement careful material storage practices.
- Maintain up-to-date material inventory.
  - Identify all chemical substances present in the workplace.
  - Label all containers showing name and type of substance, stock number, etc.
- Schedule routine cleanup operations.
- Maintain well-organized work areas.
- Train employees about good housekeeping practices.

#### (B) Preventive Maintenance

Each permittee must develop a preventive maintenance program that involves inspections and maintenance of storm water management devices and routine inspections of facility operations to detect faulty equipment. Equipment (such as tanks, containers, and drums) should be checked regularly for signs of deterioration.

**EPCRA, Section 313, Facility Preventive Maintenance Inspection Requirements**—All areas of the facility must be inspected for the following at appropriate intervals as specified in the plan:

- Leaks or conditions that would lead to discharges of Section 313 water priority chemicals
- Conditions that could lead to direct contact of storm water with raw materials, intermediate materials, waste materials or products
- Piping, pumps, storage tanks and bins, pressure vessels, process and material handling equipment, and material bulk storage areas for leaks, wind blowing, corrosion, support or foundation failure, or other deterioration or noncontainment.

#### (C) Visual Inspections

Regular visual inspections are your means to ensure that all of the elements of the plan are in place and working properly to prevent pollution of storm water runoff from your facility. Consider the following when conducting visual inspections:

- Designate qualified, trained plant personnel to regularly inspect the facility's equipment and areas, track results of inspections, make necessary changes, and maintain records of all inspections
- Ensure that inspection records note when inspections were done, who conducted the inspection, what
  areas were inspected, what problems were found, and what steps were taken to correct any problems.

These records should be kept with the plan. EPA's general permit requires that records be kept until at least one year after coverage under the permit expires.

#### (D) Spill Prevention and Response

Areas where spills are likely to occur and their drainage points must be clearly identified in the storm water pollution prevention plan. You should ensure that employees are aware of response procedures, including material handling and storage requirements. Also ensure that there is access to appropriate spill cleanup equipment.

#### **SPILL PREVENTION PLAN CONSIDERATIONS:**

- · Install leak detection devices.
- Adopt good housekeeping practices.
- Perform regular visual inspections to identify areas for potential leaks or spills.
- Recycle, reduce, and reuse process materials to minimize waste onsite.

#### SPILL RESPONSE PLAN CONSIDERATIONS:

- **Identify** a spill response team to implement the spill response plan.
- Identify safety measures.

- Include procedures for notifying appropriate authorities (police, fire, hospital, Publicly Owned Treatment Works [POTW], etc.) in the event of a spill.
- **Describe** spill containment, diversion, isolation, and cleanup practices.

**EPCRA, Section 313, Facility Spill Prevention and Response Requirements**—When a leak or spill of a Section 313 water priority chemical has occurred, the contaminated soil, material, or debris must be removed promptly and disposed of in accordance with Federal, State, and local requirements and as described in the Storm Water Pollution Prevention Plan. These facilities are also required to designate a person responsible for spill prevention, response, and reporting procedures.

#### (E) Sediment and Erosion Control

The facility's pollution prevention plan must identify activities that present a potential for significant soil erosion and measures taken to control such erosion. More information on sediment and erosion control BMPs can be found in the reference section of this guide.

#### (F) Management of Runoff

Permittees must describe existing storm water controls found at the facility and any additional measures that can be implemented to improve the prevention and control of polluted storm water. Examples include: vegetative swales, reuse of collected storm water, infiltration trenches, and detention ponds.

#### IMPLEMENTATION PHASE

At this point, you have designed your Storm Water Pollution Prevention Plan and the plan has been approved by facility management. Under the implementation phase, you must (A) implement the selected storm water BMPs, and (B) train all employees to carry out the goals of the plan.

#### (A) Implementing Appropriate Controls

In implementing the plan, a facility will:

- Develop a schedule for implementation. For example, your schedule might include a deadline for putting
  improved housekeeping measures into practice. Some controls may be immediately put into action; others
  will be phased in.
- **Assign** specific individuals with responsibility for implementing aspects of the plan and/or monitoring implementation.
- **Ensure** that management approves of your implementation schedule and strategy, and schedule regular times for reporting progress to management.

#### (B) Employee Training

Permittees must develop an employee training program that covers such topics as spill prevention and response, good housekeeping, and material management practices.

The goals of a training program are to teach personnel, at all levels of responsibility, the components and goals of the storm water pollution prevention plan and to create overall sensitivity to storm water pollution prevention concerns. The plan must include a schedule for training programs.

**EPCRA, Section 313, Facility Requirements**—There are additional training requirements for employees and contractor personnel who work in areas where EPCRA, Section 313, water priority chemicals are used or stored. These individuals must be trained in the following areas, at least once per year:

- · Preventive measures, including spill prevention and response and preventive maintenance
- Pollution control laws and regulations
- The facility's Storm Water Pollution Prevention Plan
- Features and operations of the facility that are designed to minimize discharges of Section 313 water priority chemicals, particularly spill prevention procedures.

#### **EVALUATION PHASE**

Now that your Storm Water Pollution Prevention Plan has been put to action, you must keep it up-to-date by regularly evaluating the information you collected in the Assessment Phase and the controls you selected in the Plan Design Phase. Specifically, you must (A) conduct site evaluations, (B) keep records of all inspections and reports, and (C) revise the plan as needed.

#### (A) Annual Site Compliance Evaluation

Qualified personnel must conduct site compliance evaluations at appropriate intervals, but at least once a year (at least once in 3 years for inactive mining sites). As part of your compliance evaluations, you are required to carry out the following:

- Inspect storm water drainage areas for evidence of pollutants entering the drainage system.
- **Evaluate** the effectiveness of BMPs (for example, is your site cleaner? Are your employees more familiar with good housekeeping measures and spill prevention and response practices?)
- Observe structural measures, sediment controls, and other storm water BMPs to ensure proper operation.
- **Revise** the plan as needed within 2 weeks of inspection, and implement any necessary changes within 12 weeks of the inspection.
- **Prepare** a report summarizing inspection results and followup actions, identifying the date of inspection and personnel who conducted the inspection.
- Sign the report and keep it with the plan.

#### (B) Recordkeeping and Internal Reporting

Your facility must record and maintain records of spills, leaks, inspections, and maintenance activities for at least one year after the permit expires. For spills and leaks, records should include information such as the date and time of the incident, weather conditions, cause, and resulting environmental problems.

#### (C) Plan Revisions

Major changes in a facility's design, construction, operation, or maintenance will necessitate changes in that facility's Storm Water Pollution Prevention Plan.

# GENERAL REQUIREMENTS

This section provides guidance on some of the administrative requirements related to organizing and developing your Storm Water Pollution Prevention Plan. The guidance covers (A) deadlines for plan development and implementation, (B) required signatures, (C) requirements for plan location and access, and (D) Director-required plan modifications.

#### (A) Deadlines for Plan Development and Implementation

| Schedule for Plan Development and Implementation Part IV.A.   |   |   |  |  |  |  |
|---|---|---|--|--|--|--|
| Deadline for Plan Type of Facility Development Deadline for Plan Implementation   |   |   |  |  |  |  |
| Facilities discharging storm water associated with industrial activity on or before October 1, 1992   | April 1, 1993   | October 1, 1993   |  |  |  |  |
| Facilities beginning to discharge storm water after October 1, 1992, but on or before December 31, 1992   | 60 days after commencement of discharge                             | 60 days after commencement of discharge                             |  |  |  |  |
| Facilities beginning to discharge storm water associated with industrial activity on or after January 1, 1993   | 48 hours prior to commencement of discharge (upon submittal of NOI) | 48 hours prior to commencement of discharge (upon submittal of NOI) |  |  |  |  |
| Oil and gas exploration, production, processing, or treatment operations discharging a reportable quantity release in storm water after October 1, 1992 | 60 days after release   | 60 days after release   |  |  |  |  |
| Industrial facilities rejected or denied from the group application process   | 365 days after date of rejection or denial                          | 545 days after date of rejection or denial                          |  |  |  |  |

Note: The Director may grant a written extension for plan preparation and compliance for new dischargers (after October 1, 1992) upon showing of good cause.

#### (B) Required Signatures

As with the Notice of Intent (NOI), your plan must be signed by an "authorized representative," who is a person at or near the top of your facility's management chain (the president, vice president, or a production manager) who has been delegated the authority to sign and certify this type of document.

**EPCRA, Section 313, Facility Plan Certification Requirements**—The plan must be reviewed and certified by a Registered Professional Engineer and recertified every 3 years or after the plan is significantly changed. This certification that the plan was prepared in accordance with good engineering practices does not relieve the facility owner or operator of responsibility to prepare and implement the plan, however.

#### (C) Plan Location and Public Access

Although all plans are required to be maintained onsite, some NPDES storm water permits may require that facilities submit copies of their Storm Water Pollution Prevention Plans to the Director for review. Examine your permit carefully to determine what submittal requirements apply to your facility. Plans and all required records must also be kept at least one year after the permit expires.

### (D) Director-Required Plan Modifications

Upon reviewing your plan, the permitting authority may find that it does not meet one or more of the minimum standards established by the pollution prevention plan requirements. In this case, the permitting authority will notify you of the changes that you must make to improve the plan.

#### SPECIAL REQUIREMENTS

In addition to the minimum "baseline" BMPs discussed in previous sections, facilities may be subject to additional "special" requirements. Not all facilities will have to include these special requirements in their Storm Water Pollution Prevention Plan. Be sure to check your permit closely for these conditions. In particular, EPA's general permit includes special requirements for (A) facilities that discharge storm water through municipal separate storm sewer systems, (B) facilities subject to EPCRA, Section 313, reporting requirements, and (C) facilities with salt storage piles.

## (A) Special Requirements for Discharges Through Municipal Separate Storm Sewer Systems

Industrial facilities that discharge storm water through a large or medium municipal separate storm sewer system (serving a population of 100,000 or more) must comply with any applicable conditions established by the municipality's storm water management program. These facilities will be notified by the municipality. Examples of conditions could include additional monitoring requirements and/or additional source control requirements.

### (B) Special Requirements for EPCRA, Section 313, Reporting Facilities

In addition to the other special requirements identified in this guide, the following specific control requirements must be practiced in areas where Section 313 water priority chemicals are stored, handled, processed, or transferred:

- Provide containment, drainage control, and/or diversionary structures (prevent or minimize runon
  by installing curbing, culverting, gutters, sewers, or other controls, and/or prevent or minimize exposure by
  covering storage piles).
- Prevent discharges from liquid storage areas (store liquid materials in compatible storage containers and/or provide secondary containment designed to hold the volume of the largest storage tank plus precipitation).
- Prevent discharges from material storage areas (install drainage and/or other control measures).
- Prevent discharges from loading/unloading areas (use drip pans and/or implement a strong spill contingency and integrity testing plan).
- Prevent discharges from handling/processing/transferring areas (use covers, guards, overhangs, door skirts and/or conduct visual inspections or leak tests for overhead piping).
- Prevent discharges from all the above areas (use manually activated valves with drainage controls in all areas, and/or equip the plant with a drainage system to return spilled material to the facility).
- Introduce facility security programs to prevent spills (use fencing, lighting, traffic control, and/or secure equipment and buildings).

#### (C) Special Requirements for Salt Storage Piles

Salt storage piles used for deicing or other commercial purposes must be enclosed or covered to prevent exposure to storm water (except when salt is being added or removed from the pile). Please note that piles do not need to be enclosed or covered where storm water is not discharged to waters of the United Sates. Compliance with this requirement must be met as expeditiously as practicable, but no later than 3 years after the NOI is submitted.

| POLLUTION PREVENTION TEAM  MEMBER ROSTER | Worksheet #1 Completed by: Title: Date: |
|--|---|
| Leader:                                  | Title:                                  |
| Responsibilities:                        |   |
| Members: (1)                             | Title: Office Phone:                    |
| Responsibilities:                        |   |
| (2)Responsibilities:                     | Title: Office Phone:                    |
| (2)                                      | Title:                                  |
| Responsibilities:                        | Title: Office Phone:                    |
| (4)                                      | Title:                                  |
| Responsibilities:                        | Office Phone:                           |

#### **DEVELOPING A SITE MAP**

| Worksheet #2  |  |
|---------------|--|
| Completed by: |  |
| Title:        |  |
| Date:         |  |

Instructions: Draw a map of your site including a footprint of all buildings, structures, paved areas, and parking lots. The information below describes additional elements required by EPA's General Permit.

EPA's General Permit requires that you indicate the following features on your site map:

- · All outfalls and storm water discharges
- · Drainage areas of each storm water outfall
- Structural storm water pollution control measures, such as:
  - Flow diversion structures
  - Retention/detention ponds
  - Vegetative swales
  - Sediment traps
- Name of receiving waters (or if through a Municipal Separate Storm Sewer System)
- · Locations of exposed significant materials
- Locations of past spills and leaks
- Locations of high-risk, waste-generating areas and activities common on industrial sites such as:
  - Fueling stations
  - Vehicle/equipment washing and maintenance areas
  - Area for unloading/loading materials
  - Above-ground tanks for liquid storage
  - Industrial waste management areas (landfills, waste piles, treatment plants, disposal areas)
  - Outside storage areas for raw materials, by-products, and finished products
  - Outside manufacturing areas

|          | MATERIAL INVE    | ENTORY   |          |                     | Title:  |  |         |       |                       |
|----------|------------------|----------|----------|---------------------|---|--|---------|-------|-----------------------|
|          |                  |          |          |                     | evaluate these materials for posed during the last 3 years. | or their potential to contribute pollutants to ears.             | storm w | ater/ |                       |
|          |                  | Quantity |          | Quantity<br>(units) |   |  |         |       | ignificant<br>or Leak |
| Material | Purpose/Location | Used     | Produced | Stored              | Quantity Exposed in Last<br>3 Years                         | Likelihood of contact with storm water. If yes, describe reason. | Yes     | No    |                       |
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### **DESCRIPTION OF EXPOSED SIGNIFICANT MATERIAL**

| Worksheet #3A   |  |
|-----------------|--|
| Completed by: _ |  |
| Title:          |  |
| Date:           |  |

Instructions: Based on your material inventory, describe the significant materials that were exposed to storm water during the past three years and/or are currently exposed. For the definition of "significant materials" see page 5 of this summary.

| Description of Exposed<br>Significant Material | Period of<br>Exposure | Quantity<br>Exposed<br>(units) | Location<br>(as indicated on the site map) | Method of Storage or<br>Disposal (e.g., pile, drum,<br>tank) | Description of Material Management Practice (e.g., pile covered, drum sealed) |
|--|-----------------------|--------------------------------|--|--|---|
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|  | Worksheet #4 Completed by: Title: Date:  |
|--|--|
|  |  |
| Record below all significant spills and significant leaks of toxic or haz- | ardous pollutants that have occurred at the facility in the three years prior to the |

Directions: Record below all significant spills and significant leaks of toxic or hazardous pollutants that have occurred at the facility in the three years prior to the effective date of the permit.

Definitions: Significant spills include, but are not limited to, releases of oil or hazardous substances in excess of reportable quantities.

| 1st Year Prior           |       |      |   |                  |                               |                  |        |                                    |   |                                 |
|--------------------------|-------|------|---|------------------|-------------------------------|------------------|--------|------------------------------------|---|---------------------------------|
|                          |       |      |   |                  | Description                   |                  |        | Response Procedure                 |   |                                 |
| Date<br>(month/day/year) | Spill | Leak | Location<br>(as indicated on site<br>map) | Type of Material | Quantity                      | Source, If Known | Reason | Amount of<br>Material<br>Recovered | Material No<br>Longer Exposed<br>to Storm Water<br>(True/False) | Preventive<br>Measures<br>Taken |
|                          |       |      |   |                  |                               |                  |        |                                    |   |                                 |
|                          |       |      |   |                  |                               |                  |        |                                    |   |                                 |
| 2nd Year Prior           |       |      |   |                  |                               |                  |        |                                    |   |                                 |
| Ziiù feai Fiioi          |       |      |   |                  |                               | Description      |        | Response Procedure                 |   |                                 |
| Date<br>(month/day/year) | Spill | Leak | Location<br>(as indicated on site<br>map) | Type of Material | Quantity                      | Source, If Known | Reason | Amount of<br>Material<br>Recovered | Material No<br>Longer Exposed<br>to Storm Water<br>(True/False) | Preventive<br>Measures<br>Taken |
|                          | ·     |      |   | ,,               |                               | ·                |        |                                    |   |                                 |
|                          |       |      |   |                  |                               |                  |        |                                    |   |                                 |
|                          |       |      |   |                  |                               |                  |        |                                    |   |                                 |
| 3rd Year Prior           |       | I    | I   |                  |                               |                  |        | Ī                                  |   |                                 |
|                          |       |      |   |                  | Description Response Procedur |                  |        | Procedure                          |   |                                 |
| Date<br>(month/day/year) | Spill | Leak | Location<br>(as indicated on site<br>map) | Type of Material | Quantity                      | Source, If Known | Reason | Amount of<br>Material<br>Recovered | Material No<br>Longer Exposed<br>to Storm Water<br>(True/False) | Preventive<br>Measures<br>Taken |
|                          |       |      |   |                  |                               |                  |        |                                    |   |                                 |
|                          |       |      |   |                  |                               |                  |        |                                    |   |                                 |

| NON-STORM WATER DISCHARGE<br>ASSESSMENT AND CERTIFICATION |   |  | Worksheet #5 Completed by: Title: Date:  |  |   |  |
|---|---|--|--|--|---|--|
| Date of<br>Test or<br>Evaluation                          | Outfall Directly Observed<br>During the Test (identify as<br>indicated on the site map) | Method Used to<br>Test or Evaluate<br>Discharge  |  |  | Name of Person Who<br>Conducted the Test or<br>Evaluation |  |
|   |   |  |  |  |   |  |
|   |   |  |  |  |   |  |
|   |   |  |  |  |   |  |
|   |   |  |  |  |   |  |
|   |   |  |  |  |   |  |
|   | CERTIFICATION   |  |  |  |   |  |
| submitted. E information s                                | Based on my inquiry of the per  | that this document and all attacennel properly gather and evaluative irectly responsible for gathering ware that there are significant p | ate the information the information, the |  |   |  |
| A. Name & 0   | Official Title (type or print)  | B. Area Code and Telephone No.   |  |  |   |  |
| C. Signature  | · · · · · · · · · · · · · · · · · · ·   | D. Date Signed   |  |  |   |  |

## NON-STORM WATER DISCHARGE ASSESSMENT AND FAILURE TO CERTIFY NOTIFICATION

| Worksheet #6  |  |
|---------------|--|
| Completed by: |  |
| Title:        |  |
| Date:         |  |

Directions: If you cannot feasibly test or evaluate an outfall, fill in the table below with the appropriate information and sign this form to certify the accuracy of the included information.

List all outfalls not tested or evaluated, describe any potential sources of non-storm water pollution from listed outfalls, and state the reason(s) why certification is not possible. Use the key from your site map to identify each outfall.

Important Notice: A copy of this notification must be signed and submitted to the Director within 180 days of the effective date of this permit.

| Description of Why Certification Is Infeasible | Description of Potential Sources of Non-<br>Storm Water Pollution |
|--|---|
|  |   |
|  |   |
|  |   |
|  |   |
|  |   |
|  |   |

#### CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations, and that such notification has been made to the Director within 180 days of \_\_\_\_\_\_ (date permit was issued), the effective date of this permit.

- A. Name & Official Title (type or print)

  B. Area Code and Telephone No.
- C. Signature D. Date Signed